

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Rules for the Filing of International)
Circuit Status Reports)

CC Docket No. 93-157

COMMENT OF SPRINT COMMUNICATIONS COMPANY L.P.

Sprint Communications Company L.P. ("Sprint") hereby comments upon the Commission's Notice of Proposed Rulemaking ("Notice") in the above-captioned docket (FCC 93-291), released July 2, 1993.

Sprint is a common carrier which provides facilities-based international services and which currently files monthly circuit status reports (Notice at 2, n. 2). As the Commission points out, at present only some facilities-based carriers file monthly reports, and those reports are filed in a variety of formats. Because the reports are not filed in a standard machine readable format, aggregation of the data by the Commission is "tedious" (Notice at para. 5).

The Commission seeks comments on its proposals to codify in the Commission's Rules the requirements for the filing of international circuit status reports on an annual basis; to require all facilities-based international carriers to file such reports; and to provide a filing manual with reporting instructions. For the reasons discussed below, Sprint supports the Commission's initiatives in this regard.

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In discharging its public interest responsibilities, it is important that the Commission carefully examine the need and purpose for information, as it has in this docket (Notice at para. 3). Having identified the need and purpose, the Commission can then develop the appropriate requirements. By proceeding in this manner, the Commission will ensure that it obtains the information it requires to fulfill its obligations and that carriers are not burdened unnecessarily with requirements to file information which is not used.¹

Codification of the requirement to file circuit status reports on an annual basis on or before March 31 is reasonable and appropriate. Annual circuit status filings should be sufficient to meet the Commission's need to evaluate and assess trends in the use of existing submarine cable and satellite facilities. A three month period should be an adequate amount of time for all reporting carriers to prepare the report for the previous year. Sprint therefore supports the adoption of this requirement.

Sprint agrees with the Commission that circuit status information should be required from all facilities-based international carriers. At present, only some facilities-based carriers file circuit status information. Because not all carriers file

¹If the Commission has already found that it no longer requires the information contained in the monthly circuit status reports (Notice at para. 3), it should allow the carriers to immediately discontinue such filings.

reports, any analysis of the information or "assessment of the need for new cable and satellite facilities" is necessarily incomplete. Industry-wide data will allow the Commission to make better projections and evaluations of the use of international facilities.

Sprint also supports the development of "a filing manual containing the reporting requirements and other instructions to be used by facilities-based international common carriers to prepare their reports" (Notice at 6). No manual or detailed statement of the filing requirements currently exists, and those carriers filing monthly circuit status reports have no document which clearly defines what information is required by the Commission. Undoubtedly there are inconsistencies among the carriers in how they identify services (e.g., MTS, Private Line, Global VPN) for which circuit information is provided. Additionally, in the past, Sprint has had questions about the treatment of resold circuits and the definition of circuits which traverse multiple cable systems. A manual which defines the required information and specifies the format in which the data should be provided would be extremely helpful to the reporting carriers.²

Sprint suggests that the Common Carrier Bureau seek comments on the proposed manual prior to its adoption. Such comments may contain useful suggestions from carriers, based upon the

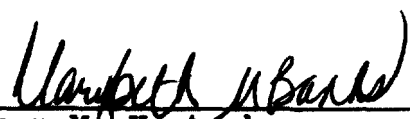
²This manual should be similar in detail to that defining the information required for the carriers' Section 43.61 annual reports.

carriers' experience in filing monthly reports, and on the services they provide and the facilities they employ. Comments should also be requested on the anticipated ease of implementing the proposed requirements.

If the Commission adopts rules requiring all carriers to file circuit status reports, it should remove the requirement contained in Section 63.10(b) of its Rules for the semi-annual reporting of circuit additions by nondominant international carriers. The information in the Section 63.10(b) reports will be duplicative of the requirement contained in the proposed Section 43.82 rules. Further, as there currently are no detailed instructions or definitions associated with Section 63.10(b), the information in that report may be inconsistent with the report filed in compliance with Section 43.82, and thus may be improperly used in conjunction with such data.

Respectfully submitted,

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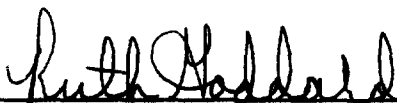
September 1, 1993

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments" of Sprint Communications Company L.P. was sent via first-class mail, postage prepaid, on this the 1st day of September, 1993, to the below-listed parties:

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